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Supreme Court, U.S.
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In The

Supreme Court of the United States

October Term, 1997

In Re: Amtrak "SUNSET LIMITED" Train Crash in Bayou Canot, Alabama, on September 22, 1993

JAMES ALTOSINO; MARIE V. ALTOSINO; JOHN L. ANDERSON; ALICE ANELLO; JOSEPH ANELLO, ET AL.,

Petitioners,

v.

WARRIOR & GULF NAVIGATION COMPANY; WILLIE C. ODOM; ANDREW STABLER; CSX TRANSPORTATION, INC.; AND NATIONAL RAILROAD PASSENGER CORP., D/B/A/ AMTRAK,

Respondents.

On Petition For Writ Of Certiorari To The United States Court Of Appeals For The Eleventh Circuit

BRIEF IN OPPOSITION TO PETITION FOR WRIT OF CERTIORARI

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QUESTION PRESENTED

Whether a right to punitive damages should be created by this Court in a maritime personal injury action?

STATEMENT OF INTERESTED PARTIES

Warrior & Gulf Navigation Company adopts the Petitioners' list of interested parties set forth in Appendix E to the Petition for Writ of Certiorari. The parent company of Warrior & Gulf Navigation Company is Transtar, Inc. The following are subsidiaries of Warrior & Gulf Navigation Company:

SISCO Stevedoring, L.L.C.

Mobile Bay Woodchip Center,
an Alabama Corporation

Mobile River Terminal Company

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OPINIONS BELOW

The opinion of the Eleventh Circuit Court of Appeals is reported at 121 F.3d 1421 (11th Cir. 1997) and is attached to the Petition for Writ of Certiorari as Appendix A. The District Court's decision is unreported and is attached to the Petition for Writ of Certiorari as Appendix C.

STATEMENT OF JURISDICTION

This Court has jurisdiction pursuant to 28 U.S.C. § 1254(1).

STATEMENT OF THE CASE

This MDL action arises out of the derailment of the Amtrak "Sunset Limited" into Big Bayou Canot, Alabama on September 22, 1993. Big Bayou Canot is a navigable tributary of the Mobile River near Mobile, Alabama.

Warrior & Gulf Navigation Company ("WGN") is in the business of operating tow boats and barges on the Mobile and Tombigbee River systems. The MAUVILLA is a tugboat that was owned and operated by WGN. On the morning of September 22, 1993 Mr. Odom was the pilot of the MAUVILLA and Captain Stabler was the captain. During the relevant times leading up to the derailment, Mr. Odom was on watch and piloting the MAUVILLA. CSX Transportation, Inc. ("CSX") is the owner of the railroad track and bridge over Big Bayou Canot and National Railroad Passenger Corporation d/b/a Amtrak

("Amtrak") owned and operated the train which derailed into Big Bayou Canot.

At approximately 6:30 p.m. on September 21, 1993 the MAUVILLA, with a standard crew of a captain, pilot and two deckhands, departed the WGN facility in Chickasaw, Alabama. The MAUVILLA proceeded to two separate fleeting areas where it picked up six barges which were to be delivered above Tuscaloosa, Alabama, a trip by river of approximately 350 miles. While the MAUVILLA was still at the fleeting area, Captain Stabler instructed Mr. Odom, a duly licensed towboat pilot who was coming on watch, to make up the tow. At that time, Captain Stabler's watch ended and he left the wheelhouse and went to bed. As the MAUVILLA proceeded northward up the Mobile River, it began to encounter haze. When Mr. Odom encountered fog affecting his visibility, he decided to tie the tow off to a tree on the bank of the Mobile River until the fog lifted. After he had decided to tie off the tow, Mr. Odom, with the assistance of his deckhand, made two unsuccessful attempts to tie off the tow to trees on the bank.

Mr. Odom then decided to proceed to another location on the Mobile River to tie off the tow. However, during the initial process of attempting to tie off, the MAUVILLA had inadvertently entered Big Bayou Canot. At the time Mr. Odom decided to proceed to another location on the Mobile River, he was unaware that the MAUVILLA had inadvertently entered Big Bayou Canot and believed that he was still in the Mobile River.

As the MAUVILLA proceeded slowly up what Mr. Odom thought was the Mobile River (but which was

actually Big Bayou Canot), he approached what he thought was a tow. He then felt a bump and two barges came back along side the tug. At that time, Mr. Odom believed that his tow had run aground and concluded that running aground had caused the two port barges to separate from the tow. As Mr. Odom maneuvered to secure the loose barges, he was unaware that the tow had inadvertently entered Big Bayou Canot and he was also unaware that the tow had inadvertently struck the Big Bayou Canot bridge. When the MAUVILLA struck the Big Bayou Canot bridge, the south end of the convertible swing span of the bridge shifted just over three feet to the west which caused a misalignment in the railroad track on the bridge.

Shortly before 3 a.m. on September 22, 1993, the Amtrak "Sunset Limited" derailed while crossing the CSX bridge over Big Bayou Canot.

Several of the surviving passengers and train crew members filed personal injury actions against WGN, Mr. Odom, Captain Stabler, CSX, and Amtrak. The WGN Defendants and CSX/Amtrak have cross-claimed against each other in these actions.

On February 8, 1994, the Judicial Panel on Multi-district Litigation entered an order consolidating all Federal Court cases for discovery and pre-trial proceedings in the United States District Court for the Southern District of Alabama.

The issue of applicable law was raised before the District Court for the Southern District of Alabama in this MDL action. After receiving extensive briefs and oral argument on the issues, the District Court ruled that

admiralty jurisdiction existed and that admiralty law would govern all of the claims in this MDL. Relevant to this petition, the District Court in its ruling on the personal injury actions, held that punitive damages as well as damages for loss of society and loss on consortium, are recoverable under admiralty law. (Record, vol. 6, no. 1134, at 31-32, 34).

The WGN Defendants and CSX/Amtrak moved for and were granted an interlocutory appeal of the District Court's ruling on issues related to recoverable damages. After briefing and oral argument, the Eleventh Circuit vacated the District Court's ruling regarding punitive damages in the personal injury cases. In refusing to allow punitive damages in personal injury cases, the Eleventh Circuit acknowledged that it was "aware of no decision in the Supreme Court or any of the Circuit Courts which has authorized punitive damages in a[n] [admiralty] personal injury case." (121 F.3d at 1426-27). It is from this ruling that the Petitioners have petitioned this Court for certiorari review.

ARGUMENT

REASONS FOR DENYING THE WRIT

I. THERE IS NO SPLIT OF AUTHORITY IN THE CIRCUITS ON THE QUESTION PRESENTED.

The law in the Circuits which have addressed the issue of whether non-pecuniary damages which include punitive damages are recoverable in a maritime personal

injury action have held that such damages are not recoverable. See *Glynn v. Roy Al Boat Management Corp.*, 57 F.3d 1495, 1501-1505 (9th Cir. 1995), *cert. denied*, 116 S.Ct. 708 (1996); *Guevara v. Maritime Overseas Corp.*, 59 F.3d 1496, 1512-1513 (5th Cir. 1995) (*en banc*), *cert. denied*, 116 S.Ct. 706 (1996); *Chan v. Society Expeditions, Inc.*, 39 F.3d 1398, 1407-08 (9th Cir. 1994), *cert. denied*, 115 S.Ct. 1314 (1995); *Horsley v. Mobil Oil Corp.*, 15 F.3d 200, 203 (1st Cir. 1994); *Lollie v. Brown Marine Service, Inc.*, 995 F.2d 1565 (11th Cir. 1993).

In their petition for certiorari, the Petitioners listed two decisions of Courts of Appeals that supposedly authorized the recovery of such damages. However, the cases listed by Petitioners, *American Dredging Co. v. Lambert*, 81 F.3d 127 (11th Cir. 1996) and *Randall v. Chevron U.S.A., Inc.*, 13 F.3d 888 (5th Cir. 1994) are both wrongful death cases and do not address the recoverability of punitive damages in maritime personal injury actions. It should also be noted that there are subsequent decisions from each of those Circuits which have denied the recoverability of nonpecuniary damages in the *personal injury* context. *In Re Amtrak "Sunset Limited" Train Crash*, 21 F.3d 1421, 1428-29 (11th Cir. 1997); *Nichols v. Petroleum Helicopters, Inc.*, 17 F.3d 119, 122-23 (5th Cir. 1994). Accordingly, this is not an area of the law where the Circuit Courts are divided on the issue. To the contrary, the Circuit Courts are virtually unanimous in their decisions that nonpecuniary damages are not recoverable in a maritime personal injury action.

Although the Petitioners note the different classifications of maritime personal injury plaintiffs, the decisions of the various Circuits that have addressed the issue of

recovery of nonpecuniary damages have been consistent regardless of the classification of the Plaintiff.[1] *Chan*, 39 F.3d at 1408 (non seaman); *Lollie*, 95 at 1565 (non seaman); *Nichols*, 17 F.3d at 122-123 (longshoreman).

In the Appendix to their Petition, Petitioners cite District Court cases that have allowed for the recovery of nonpecuniary damages in the maritime personal injury context. However, it should be noted that many of the District Court decisions relied upon by Petitioners were rendered prior to decisions by the reviewing Circuit which held that such damages were not recoverable. For instance, the decisions rendered by the Eastern District of Louisiana were rendered before the Fifth Circuit's decisions in *Guevara, Nichols* and *Murray v. Anthony J. Bertucci Const. Co., Inc.*, 958 F.2d 127 (5th Cir.), *cert. denied*, 506 U.S. 865 (1992). Furthermore, these District Court decisions are not binding on the Circuits and the reasoning of these decisions has not been adopted by any Circuit.

A review of the decisions on the question presented by Petitioners clearly indicates that there is no division among the Circuits on this issue. This point is conceded by the Petitioners in their statement that "virtually every Court of Appeals . . . [has] denied punitive damages in maritime personal injury cases." (Petition at 21). There is

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[1] In maritime personal injury actions, a Plaintiff may be either a seaman covered by the Jones Act, 46 U.S.C. § 688 *et seq.*, a longshoreman covered the Longshoremen's & Harbor Workers' Compensation Act, 33 U.S.C. § 901 or a "non seaman", *Yamaha Motor Corp., U.S.A. v. Calhoun*, 116 S.Ct. 619, 623, n.2 (1996) (a non seaman or "seafarer" is a person who is not covered under the Jones Act or the Longshoremen's & Harbor Workers' Compensation Act).

no reason for this Court to grant the Plaintiffs' petition for certiorari because there is simply no dispute among the Circuits on this issue. This has been recognized by this Court by its denial of certiorari in *Guevara, Glynn, Chan* and *Murray*.

II. THIS COURT'S DECISION IN *YAMAHA MOTOR CORP., U.S.A. V. CALHOUN*, DOES NOT SUPPORT RECOVERY OF PUNITIVE DAMAGES IN MARITIME PERSONAL INJURY ACTIONS.

As the cases cited in § I demonstrate and as Petitioners concede, there is no division in the Circuit Courts on the issue of recoverability of punitive damages in maritime personal injury actions. The Circuit Courts have all held that nonpecuniary damages are not recoverable in maritime personal injury actions. Despite the absence of conflict on this issue, Petitioners argue that the decision of this Court in *Yamaha Motor Corp., U.S.A. v. Calhoun*, 116 S.Ct. 619 (1996) has somehow created "widespread confusion" in the Courts about the recoverability of punitive damages in maritime personal injury actions. (Petition at 14.) However, it is evident from the case law that this Court's holding in *Yamaha Motor Corp., U.S.A.*, in fact, created no such confusion.

Yamaha Motor Corp., U.S.A., is a wrongful death case. The question presented by Petitioners involves personal injury cases. Petitioners attempt to create "confusion" by applying the holding in a wrongful death case in a personal injury context. However, there is no legal basis for such application. Maritime law for recovery for wrongful

death and maritime personal injury law are distinct bodies of law with separate historical development.

A. Historical Development of Maritime Wrongful Death Law

In 1886, the Supreme Court held in *The Harrisburg*, 119 U.S. 199 (1886) that there was no cause of action for wrongful death under the general maritime law. After this Court reached its decision in *The Harrisburg*, Federal Courts resorted to state law to provide a remedy in maritime wrongful death actions. *See, The Hamilton*, 207 U.S. 398, 407 (1907). In addition, Congress mitigated the impact of *The Harrisburg* by enacting two statutes affording recovery for wrongful death. In 1920, Congress passed the Death on the High Seas Act (DOHSA), 46 U.S.C. § 761 *et seq.*, which provides a federal claim for wrongful death occurring more that three nautical miles from the shore of any state or territory. In that same year, Congress also passed the Jones Act, 46 U.S.C. § 688 *et seq.*, which provides a wrongful death claim to the survivors of seaman killed in the course of their employment, whether on the high seas or in territorial waters. In those areas where Congress did not provide a remedy for wrongful death, the Courts continued to look to state law in claims for death in territorial waters. *Hess v. United States*, 361 U.S. 314 (1960).

In 1970, this Court overruled its decision in *The Harrisburg* in the case of *Moragne v. States Marine Lines, Inc.*, 398 U.S. 375 (1970). In *Moragne*, this Court recognized an admiralty cause of action for wrongful death occurring in territorial waters. In 1996, this Court issued its decision in

Yamaha Motor Corp., U.S.A. which addressed the issue of wrongful death recovery for deaths occurring in state territorial waters. The decision in *Yamaha Motor Corp., U.S.A.* reconciled the former practice of allowing state law remedies to apply in maritime wrongful death actions and this Court's decision in *Moragne*. The holding in *Yamaha Motor Corp., U.S.A.* did not involve a personal injury claim and did not address recovery in a maritime personal injury action.

B. Maritime Personal Injury Law

Unlike maritime wrongful death law, Admiralty Courts have always provided a remedy for personal injury. *The Washington & The Gregory*, 76 U.S. (9 wall.) 513 (1870); *Pope & Talbott, Inc. v. Hawn*, 346 U.S. 406 (1853). Not only has admiralty law provided a remedy in the personal injury context, admiralty law provides the *sole* remedy. This was clearly expressed in this Court's decision of *Kermarec v. Compagnie Generale Transatlantique*, 358 U.S. 625 (1959) which was a case involving injury to a non seaman on a vessel berthed at a pier. In *Kermarec*, this Court refused to apply a state law remedy and held:

> The District Court was in error in ruling that the governing law in this case was that of the State of New York. Kermarec was injured aboard a ship upon navigable waters. It was there that the conduct of which he complained occurred. The legal rights and liabilities arising from that conduct were therefore within the full reach of the admiralty jurisdiction and measurable by

> the standards of admiralty law. [citations omitted].

Id. at 628.

The remedy provided by admiralty law for personal injury is a complete and adequate remedy that allows for the injured party to be compensated for his or her injuries. Admiralty law has always provided a remedy, the goal of which is to compensate the injured party for injury. *The City of Panama*, 101 U.S. 453, 462 (1879) (admiralty law provides a "claim for compensation" to a non seaman injured on a ship). This emphasis on compensatory damages only is shown by the various Circuit Courts' refusal to allow recovery of punitive damages. *Glynn*, 57 F.3d at 1505; *Horsley*, 15 F.3d at 203.

While admiralty law allows for an injured party to be compensated for his injuries, there has never been a right to punitive damages in admiralty personal injury cases. This is most clearly demonstrated by the Circuit Court maritime personal injury cases listed in § I above that have prohibited the recovery of punitive damages. This is further demonstrated by the various laws passed by Congress governing admiralty matters. Punitive damages are not allowed under the Jones Act which provides compensation for injured seaman. *Miles v. Apex Marine Corp.*, 498 U.S. 19, 32-33 (1990). Furthermore, only pecuniary damages are allowed for recovery under the Death On the High Seas Act. *Zicherman v. Korean Airlines Co.*, 116 S.Ct. 629, 637 (1996). As these Congressional enactments demonstrate, punitive damages are disfavored under admiralty law.

In addition to being disfavored under admiralty law, federal maritime law makes clear that, contrary to Petitioners' contention, there is no "right" to punitive damages. Although not an admiralty case, this Court held in *Smith v. Wade*, 461 U.S. 30 (1983), that punitive damages "are never awarded as a right, no matter how egregious the defendant's conduct". *Id.* at 52. Accordingly, the personal injury plaintiffs have no "right" to punitive damages to supersede or supplement established maritime law which does not allow recovery of punitive damages in personal injury actions.

There is no question that the recovery scheme in a maritime personal injury action and a maritime wrongful death action are different. The difference has existed for over 100 years and the cases reflect that there has never been any confusion in their respective applications. Nor has this Court's holding in *Yamaha Motor Corp., U.S.A.* created confusion among the Circuits on this issue. No Circuit Court has held that a maritime personal injury remedy should be supplemented by state law. Thus, the alleged "confusion" is wholly manufactured.

III. THE APPLICATION OF PERSONAL INJURY MARITIME LAW IS CONSTITUTIONALLY APPROPRIATE.

Petitioners argue that the application of maritime personal injury law as it has been applied for over 100 years violates the concept of equal protection as provided for in the Fifth Amendment of the United States Constitution. Petitioners base their argument on a comparison of

the remedy for recovery for personal injury under maritime law with maritime law's wrongful death remedy for a non seaman killed in state territorial waters as established in *Yamaha Motor Corp., U.S.A.* Admittedly, punitive damages may be available in a maritime wrongful death action involving a non seaman if certain evidence is presented while punitive damages may not be recovered in a maritime personal injury action. However, this distinction is no basis for constitutional concern.

As previously demonstrated, there is no "right" to punitive damages. *Smith*, 461 U.S. at 52. Furthermore, the fact that a plaintiff is precluded from recovering punitive damages does not render a remedy constitutionally deficient. If Petitioners' argument were correct, then the Jones Act, 46 U.S.C. § 688 *et seq.*, and the Death on the High Seas Act, 46 U.S.C. § 761 *et seq.*, would be constitutionally defective because neither provide for the recovery for punitive damages. Furthermore, various states have precluded the recovery of punitive damages in certain circumstances.[2]

The is no equal protection concern simply because the remedy in a maritime personal injury action does not allow for the recovery of punitive damages. There are numerous instances in both state and federal law where

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[2] Punitive damages are not available in Nebraska. *Distinctive Printing & Packaging Co. v. Cox*, 443 N.W.2d 566, 574 (Neb. 1989). Other states prohibit punitive damages unless expressly authorized by statute. *See, Santana v. Registrars of Voters of Worcester*, 502 N.E. 2d 132, 135 (Mass. 1986); *Barr v. Interbay Citizens Bank*, 635 P.2d 441, 443 (Wash. 1981); *Billiot v. B.P. Oil Co.*, 645 So.2d 604, 609 (La. 1994).

Plaintiffs are precluded from recovering punitive damages without being deprived of constitutional rights, e.g., Jones Act, 46 U.S.C. § 688, *et seq.*; DOHSA 46 U.S.C. § 761 *et seq.*; *Distinctive Printing & Packaging Co. v. Cox*, 443 N.W.2d 566, 574 (Neb. 1989). Accordingly, the decision of the Eleventh Circuit raises no constitutional concern.

CONCLUSION

There is no reason for this Court to grant the Petition for Writ of Certiorari requested by Petitioners. The decision of the Eleventh Circuit precluding recovery of punitive damages in a maritime personal injury claim is consistent with the decisions of every other Circuit that has addressed this issue. Furthermore,there is no confusion in the law on this issue. The state of the law is clear that punitive damages are not recoverable in a maritime personal injury claim. For these reasons, WGN Defendants respectfully request that the Petition for Writ of Certiorari be denied.

Respectfully submitted,

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